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March 10, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

Porsche Cars North America, Inc
980 Hammond Drive
Suite 1000
Atlanta, Georgia 30328
(770) 290-3500 Fax: (770) 290-3700

Re: Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911
Emergency Calling Systems - CC Docket No. 94-102 - IB Docket No. 99-67
Federal Register Notice of January 23, 2003 (68 FR 3214)

Dear Ms. Dortch,

On behalf of Dr. Ing. h.c.F Porsche AG, Porsche Cars North America, Inc. submits the following comments in response to the Commission's January 23, 2003 FNPRM concerning the subject-referenced matter as it relates to motor vehicle telematics.

Consistent with the comments filed by the Association of International Automobile Manufacturers (AIAM) on February 19, 2003, we believe that motor vehicle telematics are at a much too early stage of development to be strictly regulated and that any attempt to do so could hamper future innovation, increase costs and result in manufacturers not offering such technologies that they might otherwise offer. The above statement is applicable to issues such as vehicle labeling, callback or location features, mandatory procedures for handling customer calls, automatic crash notification, and digital technology.

In addition, as a small independent manufacturer, Porsche is especially concerned about the competitive effect were the FCC to require mandatory services. For small companies like Porsche, we may not be able to offer such services immediately because of our low production volumes and our inability to obtain the services nationwide. Therefore, if specific telematics services should become mandatory, we could be irreparably damaged. We sincerely hope that the FCC will have the wisdom to let the market drive the need for this service.

We also hope that the FCC will understand that telematics are an integral part of the motor vehicle design. Should the FCC conclude that some regulatory requirements are necessary, it should allow manufacturers ample time to implement the new requirements. For Porsche, an independent car company not affiliated with any other manufacturers, our limited production volume and model range make phase-in's of little benefit and generally cause us to come into compliance during the first year of the phase-in. If a phase-in is offered, small companies like Porsche should be granted until the end of the phase-in to comply otherwise the regulation creates a competitive

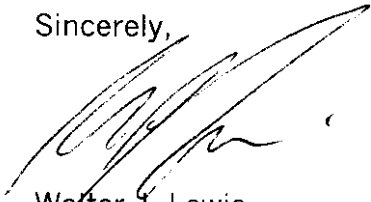
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Ms. Marlene H. Dortch
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disadvantage for smaller companies with fewer resources and we do not believe that this is the intention of the FCC.

We would like to thank the Commission for offering us an opportunity to comment its notice of proposed rulemaking. Should you have any questions, please call me at (770) 290-3627.

Sincerely,

A handwritten signature in black ink, appearing to read 'Walter J. Lewis', with a stylized flourish at the end.

Walter J. Lewis
Regulatory Affairs Manager

cc: Gregory W. Guice, Attorney Advisor, Policy Division, FCC
cc: David Siehl, Attorney Advisor, Policy Division, FCC
cc: Arthur Lechtman, Attorney Advisor, Policy Division, FCC